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Attorneys for Individual and Representative
Plaintiffs Michael Devine, Mark Fichtner,
Siddharth Hariharan, Brandon Marshall, and Daniel Stover

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**In re: High-Tech Employee Antitrust
Litigation**

This Document relates to:

All Actions

Master Docket No. 11-CV-2509-LHK

**Declaration of Joseph R. Saveri in Support of
Plaintiffs' Unopposed Administrative Motion
to Amend Pretrial Order No. 1**

I, Joseph R. Saveri, declare as follows:

1. I am the Founding Partner of the Saveri Law Firm. I am an attorney of record in this matter for Plaintiffs Michael Devine, Mark Fichtner, Siddharth Hariharan, Brandon Marshall and Daniel Stover. I previously appeared in this matter on behalf of Plaintiffs during the time in which I was a partner at the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP ("Lieff Cabraser"). I submit this Declaration in Support of Plaintiffs' Unopposed Administrative Motion to Amend Pretrial Order No. 1. I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to them.

2. On, September 12, 2011, the Court entered a Stipulated Pretrial Order As Modified No. 1. (Docket 84) By the Order, among other things, the Court appointed me as Lead Counsel.

3. To date, I have played an integral role in each phase of this litigation. I conducted the initial investigation and filed these actions. I have successfully briefed and argued all motions and

1 represented Plaintiffs at all case management conferences and other proceedings before the Court. I
2 negotiated the litigation schedule with Defendants. I organized the discovery in this matter and met and
3 conferred with Defendants on numerous occasions on scheduling, discovery, including ESI, and other case
4 management issues.

5 4. During my 25 year legal career, I have handled numerous antitrust and other groundbreaking and
6 landmark cases, including most recently the direct purchaser price-fixing claims against the cartel of TFT-
7 LCD manufacturers which has produced over \$400 million in settlements. A summary of my experience
8 can be found at <http://tinyurl.com/72xslrp>. Prior to opening my own law firm, I served as the Chair of
9 Lieff Cabraser's Antitrust and Intellectual Property practice group I founded and developed. This year, it
10 was recognized this year as one of the top five practice groups in California. Information on the Saveri Law
11 Firm can be found at www.saverilawfirm.com.

12 I declare under penalty of perjury, under the laws of the United States, that the foregoing is true
13 and correct and that this Declaration is executed on June 3, 2012 at San Francisco, California.

14 By: /s/ Joseph R. Saveri
15 Joseph R. Saveri
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